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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**
17

18 JUSTIN CASTILLO, as an individual and on
behalf of all others similarly situated,

19 Plaintiff,

20 v.

21 CAESARS ENTERTAINMENT
22 CORPORATION and DESERT PALACE,
LLC d/b/a CAESARS PALACE HOTEL &
23 CASINO,

24 Defendants.
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CASE NO. 2:18-cv-2297-GMN-NJK

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND BRIEFING SCHEDULE ON
MOTION FOR JUDGEMENT ON THE
PELADINGS AND MOTION TO STAY THIS
ACTION OR, ALTERNATIVELY, TO STAY
DISCOVERY**

(This is the parties' first request for an extension
relating to the subject motions)

Judge: Hon. Gloria M. Navarro, Chief Judge
Action Docketed: Dec. 3, 2018

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3 Plaintiff Justin Castillo (“Plaintiff”) and Defendants Caesars Entertainment Corporation
4 and Desert Palace, LLC d/b/a Caesars Palace Hotel & Casino (“Defendants” and collectively
5 with Plaintiff, the “Parties”), by and through their respective counsel, hereby stipulate and agree
6 that Plaintiff’s deadline to respond to Defendants’ Motion to Stay the Litigation or,
7 Alternatively, to Stay Discovery [ECF 48, corrected by ECF 50] and Defendants’ Motion for
8 Judgment on the Pleadings [ECF 47] is extended from January 4, 2019 to January 31, 2019, and
9 Defendants’ deadline to file reply briefs in support thereof is extended to February 14, 2019.
10 The Parties further stipulate and agree as follows:

11 1. Plaintiff filed this action on August 2, 2018, as an individual and on behalf of all
12 others similarly situated, in the Superior Court of California for the County of Marin, captioned
13 *Justin Castillo v. Caesars Entertainment Corporation and Desert Palace, LLC dba Caesars*
14 *Palace Hotel & Casino*, Case No. CIV-1802716. Service of the Complaint and Summons was
15 made on Defendants on August 22, 2018.

16 2. Defendants timely removed this action to the United States District Court for the
17 Northern District of California on September 21, 2018.

18 3. Defendants timely moved, under Federal Rule of Procedure 12(b)(2), to dismiss
19 this case for lack of personal jurisdiction, or alternatively to transfer this case to the District of
20 Nevada on September 28, 2018. Defs.’ Mot. to Dismiss or Alternatively to Transfer, ECF No.
21 20, *Castillo v. Caesars Entm’t Corp.*, No. 18-cv-05781-EMC (N.D. Cal. Sept. 28, 2018).

22 4. The United States District Court for the Northern District of California issued a
23 ruling on November 28, 2018 finding that it lacked personal jurisdiction over Defendants in this
24 suit and transferring this case to the District of Nevada under 28 U.S.C. § 1631. *See Castillo v.*
25 *Caesars Entm’t Corp.*, No. 18-cv-05781-EMC, 2018 WL 6199682 (N.D. Cal. Nov. 28, 2018).

26 5. This case was transferred and docketed in this Court on December 3, 2018. ECF
27 No. 34.
28

1 6. Defendants requested an extension of time to respond to Plaintiff's Class Action
2 Complaint (ECFs No. 40, 42), which the Court initially denied (ECF No. 41) but then granted in
3 part (ECF No. 43) thereby extending Defendants' time to respond to Plaintiff's Complaint up to
4 and until December 21, 2018.

5 7. On December 21, 2018, Defendants filed (1) an Answer to Plaintiff's Complaint
6 (ECF No. 44); (2) a Motion for Judgment on the Pleadings pursuant to Federal Rule of Civil
7 Procedure 12(c) (ECF No. 47); and (3) a Motion to Stay This Action or, Alternatively, to Stay
8 Discovery (ECF No. 48). Plaintiff's response to Defendants' Motion to Stay and the Rule 12(c)
9 Motion is currently due January 4, 2019, and Defendants' deadline to file replies in support of
10 their motions is currently January 11, 2019.

11 8. Good cause exists for the briefing schedule extensions requested herein.
12 Defendants' motions were filed just before Christmas, and Plaintiff's response briefs are due just
13 after New Year's. Co-lead counsel and one of the primary brief writers for Plaintiff, Mark S.
14 Greenstone, was away on vacation from December 21, 2018 through December 26, 2018, and is
15 scheduled to be away again from December 29, 2018 through January 2, 2019. In addition, Mr.
16 Greenstone and co-lead counsel in this case Glancy Prongay & Murray ("GPM") are also lead
17 counsel in two other class actions with dispositive motion response briefs to be filed in January
18 of 2019.

19 9. Should Plaintiffs' response deadline be extended, Defendants' counsel similarly
20 seek a brief extension of Defendants' reply deadline to February 14, 2019 (two weeks instead of
21 one week) in light of commitments in other cases in early February of 2019, including an
22 argument in the D.C. Circuit involving members of the defense team.

23 10. This is the first stipulation for an extension of time relating to the subject motions.

24 **IT IS SO STIPULATED AND AGREED.**

25 Respectfully submitted,

26 Dated: December 31, 2018

By /s/ David C. O'Mara

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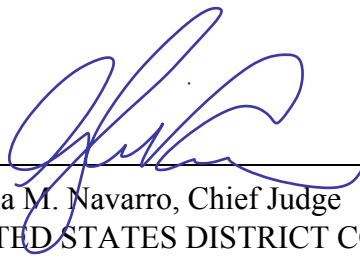
Attorneys for Defendants

*Caesars Entertainment Corporation and
Desert Palace, LLC d/b/a Caesars Palace
Hotel & Casino*

ORDER

IT IS SO ORDERED.

DATED this 10 day of January, 2019.



Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT